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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

MAYRA MARGARITA }  
HERNANDEZ, }  
Plaintiff, }  
vs. }  
KILOLO KIJAKAZI, }  
Acting Commissioner of Social }  
Security, }  
Defendant. }  
Case No. 1:20-cv-00897-NONE-BAM  
STIPULATION AND ORDER FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 14-day extension of time, from December 30, 2021 to January 13, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S REPLY BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

Good cause exists for this request. While the parties modified the scheduling order giving Plaintiff until December 30, 2021 to file her Reply Brief (Dkt. No. 28), Counsel for the Plaintiff requires a short 14-day extension to accommodate

1 this brief. Counsel for the Plaintiff has experienced a reduction in staff due to new  
2 infections within his office requiring several employees to quarantine with limited  
3 remote work. This setback has caused Counsel to trail behind on his brief writing,  
4 administrative work and end-of-year tasks.

5 Counsel apologizes to the Court and Defendant for this delay. Defendant  
6 does not oppose the requested extension.

7  
8 Respectfully submitted,

9 Dated: December 27, 2021 PENA & BROMBERG, ATTORNEYS AT LAW  
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11 By: /s/ Jonathan Omar Pena  
12 JONATHAN OMAR PENA  
13 Attorneys for Plaintiff

14  
15 Dated: December \_\_, 2021 PHILLIP A. TALBERT  
16 Acting United States Attorney  
17 DEBORAH LEE STACHEL  
18 Regional Chief Counsel, Region IX  
19 Social Security Administration

20 By: \*/s/ Geralyn Gulseth for Daniel Talbert  
21 Geralyn Gulseth for Daniel Talbert  
22 Special Assistant United States Attorney  
23 Attorneys for Defendant  
24 (\*As authorized by email on December 27, 2021)

## **ORDER**

Pursuant to the parties' request, and for good cause shown, IT IS SO ORDERED that Plaintiff shall have an extension, up to and including January 13, 2022, to respond to Defendant's Opposition. All other dates in the Court's Scheduling Order (Doc. No. 11.) shall be extended accordingly.

IT IS SO ORDERED.

Dated: December 28, 2021

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE